July 20, 2005

U.S. Environmental Protection Agency, Region IX Attn: Clinton Seiter 75 Hawthorne Street San Francisco, CA 94105

Dear Mr. Seiter::

Regarding your 7/13/05 Compliance Evaluation Inspection of Crystal Technology, Inc., enclosed, please find:

- Manifest copies
- Training agenda and records for Richard Rosas
- Job description for Richard Rosas
- Facility map
- RCRA/Title 22 Training Purchase Order

Please note that:

- 1. I have written comments on some of the above documents to better place them in context with our inspection.
- 2. We are currently revising our job descriptions, and,
- 3. Training for ERT/Chemical handlers was revised in December, 2004. All Crystal Technology employees that handle hazardous waste will undergo RCRA and Title 22 waste handler refresher training by a qualified vendor.

Due to the fact that we have recently become an ISO14001 registered company, we have an Environmental Management System that, while comprehensive, is difficult to easily explain, therefore, I may have included more information in this packet than you may need. So please feel free to contact me @ (650) 354-0165 if you have questions or if I may be of assistance. Thank you.

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EPA ID# CAD 980 882 369

1040 East Meadow Circle Palo Alto, California 94303-4230	Corporate Offices: Corporate Fax:	(650) 856-7911 (650) 424-8806
Direct Line #	Sales Fax:	(650) 354-0173
Direct Fax #	www.crystaltechnolog	y.com

See Instructions on back of page 6.

ORDER # 333665

Department of Toxic Substances Control

print or type. Form designed for use on elife (12-pit	cn; rypewriter.							Sacramento, California
UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA		Manifest Do		No. 8 4	2. Page 1		n in the shaded areas pired by Federal law.
3. Generator's Name and Mailing Address	- 12 W W W	10 10 12 12 13	107 (1 97	1 4		Manifest Document N	lumber	
CRYSTAL TECHNOLOGY INCOR 1040 E. MEADOW CIRCLE PALO ALTO, CA 94303 4 Generator's Phone (650) 354-014						Generator's ID		24573284
4. Generator's Phone (650) 354-014	9 Margi	ncy commen	EQUE 15					
5. Transporter 1 Company Name UNIVAR USA INC.	6.	US EPA ID Number		Š	Maria .	ransporter's ID [<u>Rese</u>	erved.]	
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7. Transporter 2 Company Name UNIVAR USA INC.	8.	US EPA ID Number			40.00	ransporter's ID <u>[Rese</u>	ryed.]	
		A R 0 0 0	0 4 7 6 9	3 0	16	orter's Phone 3	23-83	7-7147
9. Designated facility Name and Site Address DEMENNO/KERDOON 2000 N. ALAMEDA STREET COMPTON, CA 90222		US EPA ID Number	الململمام			THE RESERVE OF THE PARTY OF THE	10 69	
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11. US DOT Description (including Proper Shippi	ng Name, Hazard Class, e	and ID Number)	12 N	o. Conto	Type	13. Total Quantity	14. Unit Wt/Vol	i. Waste Number
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3, SGAL POLY CARA								State EPA/Other
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GENERATOR'S CERTIFICATION: I hereby accommarked, and labeled, and are in all respects								
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18. Transporter 2 Acknowledgement of Receipt of	Materials	(v) k	A 1/1	April 1 Print Park			IOI	HAIDIOK
Printed/Typed Name		Signature					Mon	th Day Year
19. Discrepancy Indication Space								
20. Facility Owner or Operator Certification of re-	ceipt of hazardous materi	als covered by this ma Signature	anifest except as no	oted in I	tem 19.		Mon	th Day Year
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IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802: WITHIN CALIFORNIA, CALL 1-800-852-7550

DO NOT WRITE BELOW THIS LINE.

Signature

Signature

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

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18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Printed/Typed Name

19. Discrepancy Indication Space

O15

Year

Year

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Day

Day

Month

Month



Onyx Environmental Servicees, L.L.C. Azusa, California

WASTESTREAM INFORMATION PROFILE

Recertificat	ion									Disposal Code	
□ONYX LO	CATION		OF	ICE			CITY		ST7	ATE-	
X Invoice Add	ress Un	ivar USA, I		Commerce, CA 90040							
ONYX TSDE	requested	AZU	Technology requested	Fuel Blending		Gene	rator No.	Generator E	PA ID No.	CAD980882369	9
l. Generato	r Name	Crystal Tec	hnology, Inc.					- Generator St	ate No.		
Address			Meadow Circle					State Wastes		212	
Auditas		TO TO LEAST I	orcadow Oncio					_ State Wastes	u cam roc	212	
City		Palo Alto			State	CA	Country		ZIP	94303	
NAICS (SIC) Code	3679			Source	A10	Origin 1	For	rm B101	System Type	M099
2. Waste Na	ame M	lixed Solven	t Rinse					Lab or Waste	Area		
3. Process C	- Generating V	Vaste]	Bottle Rinse					-			
4. Shipping	Name H	azardous wa	aste, liquid, n.o.s. (con	ains Acetone, Methanol)							
Hazard C	-		UN/NA No. NA3		RQ an	nt 0	lb				
RQ Desc:	1.				2						
DOT Desc:	1.	··			7	2.					
5. Waste Co	des F0	03 212									
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b 2-5			X .8 - 1.0	b 80 - 100				settleable			
c <u>X</u> 5-9		C	1.0	c 101 - 140			%	dissolved	< 20	000	
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Viscosity by			(syrup) im (oil)	high (syrup) medium (oil)			high (syrup medium (o	3,	varie	es	
Layer		low (v		low (water)			low (water)	1			
		solid		solid			solid				
Used oil y/n	N HOO	C<1000 ppm	or >1000	ppm				-			

Page 1 of 2

WIP NO.

Profile Temp Univar #: iemjg517

	ine Pollutant, S = Severe Marine Pollutan ene NESHAP, T = TRI Chemical, C = C			gen]	_				_ '	
Constituents	Range		Units		Con	stituents			Range	Unit
Acetone	0.00 -	1.00	%			·. · · · · · · · · · · · · · · · · · ·				
Isopropyl Alcohol	0.00 ~	1.00	%							
Methanol	0.00 -	1.00	%							
Dye	0.00 -	1.00	%							
Water	0.00 -	96.00	%							
tal Composition Must Equal or Exceed 100%	%									
her:										
Is the wastestream being imported into the						Yes _	No	$\frac{X}{X}$		
Does the wastestream contain PCBs regular PCB concentration	ated by 40 CFR?					Yes _	_ No	X		
Is the wastestream subject to the Marine Po Is the wastestream subject to Benzene NES						Yes _ Yes	No	$\frac{x}{x}$		
If yes, is the wastestream subject to Notific						Yes _	_ No	_		
Benzene concentration Is the wastestream subject to RCRA subpa	ppm art CC controls?					Yes	No	X		
Volatile organic concentration, if known	ppmw	_					_	_		
CC approved analytical method Is the wastestream from a CERCLA or sta	ite mandated cleanup?	Generat	or Kn	owledge	-	Yes _	_ No	<u>x</u>		
. Container Information (Ide	entify UN container marking if known)									
Packaging: Bulk Solid Type	pe/Size; Bulk	Liquid		Type/Size:		Di	um X	Type/Size:	DM / 55 g	allon
Other		•	-							
						-				
Shipping Frequency: Units —	Per Month	¢	uarter	Ye		One Ti	me 	Other		
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. Additional Information:										
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reby certify that all information submitted in t O CFR 261 - Appendix I or by using an equiv	valent method. All relevant information									
reby certify that all information submitted in the CFR 261 - Appendix I or by using an equivorize sampling of any waste shipment for pure.	valent method. All relevant information process of recertification.	regardii	ng kno	wn or suspected h	azards in the po	ossession of				
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Profile Temp Univar #: iemjg517

FACILITY NOTIFICATION

SIGNATURE

TSDF PROCESSING USE ONLY:

Yes

Describe

PPE REQUIRED No.

See Instructions on back of page 6.

ORDER # 334553

Department of Toxic Substances Control Sacramento, California

4	UNIFORM HAZARDOUS	1. Generator's US I	EPA ID No.	Manifest Documen	t No.	2. Page 1		n in the shaded areas
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	4. Generator's Phone (650) 354-014	9 mar i	MINCY CONTACT:	DOX 15	o. sidie C	i i i i i	1 1	
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F	19. Discrepancy Indication Space		•					
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Ĺ	20. Facility Owner or Operator Certification of rec	eipt of hazardous mat	erials covered by this manife	st except as noted in	Item 19.			
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IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802: WITHIN CALIFORNIA, CALL 1-800-852-7550

State of California—Environmental Profection Agency
Forma Approved OMB No. 2050–0039 (Expires 9-30-99)
Please print or type. Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of page 6.

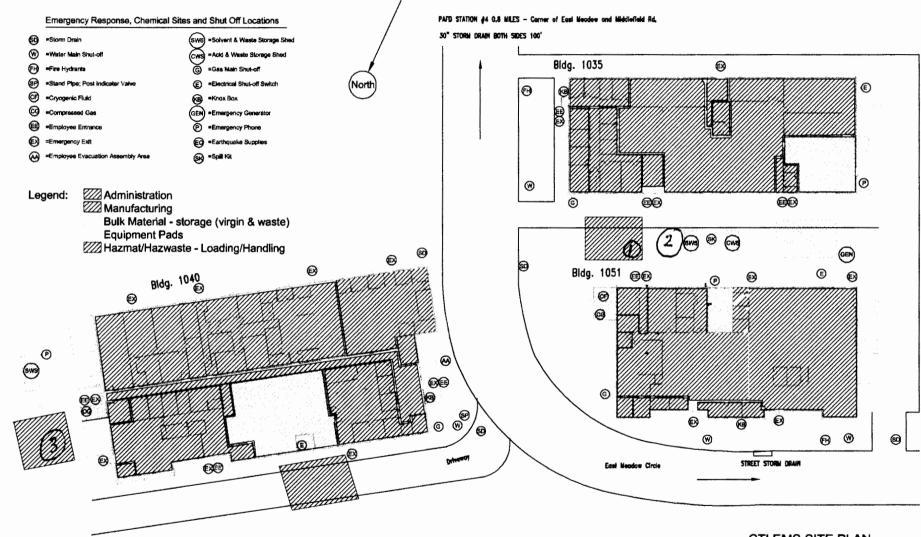
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334588 Department of Toxic Substances Control Sacramento, California

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DO NOT WRITE BELOW THIS LINE.

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802: WITHIN CALIFORNIA, CALL 1-800-852-7550



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CTI EMS SITE PLAN EPR0002-01 Revision 0 28 October 2003

JOB DESCRIPTION

TITLE: High Vacuum Equipment Maintenance

DEPARTMENT: Maintenace/1040 EMPLOYEE (S): Richard Rosas

IMMEDIATE SUPERVISOR & POSITION: Mike Ambrose, Maintenance Supervisor

PRIMARY FUNCTION: Under minimum supervision, performs complex inspections, repairs and preventative maintenance functions on production equipment.

DUTIES & RESPONSIBILITIES:

- 1. Performs scheduled maintenance from Maintenance Request forms.
- 2. Performs inspections and preventative maintenance on production equipment.
- 3. Performs repair on electro-mechanical production equipment.
- 4. Records work performed on Maintenance Request forms.
- 5. Minimizes negative impact on production.
- Works on High Vacuum systems. 6.
- 7. Specifies manpower and repair parts required for scheduled maintenance. Records information on Maintenance Request forms and Parts to be Ordered forms.
- 8. Acts as project leader as assigned.
- 9, Provides written status reports.
- 10. Provides leadership and training to lower level employees.
- Performs other duties as required. 11.

SAFETY REQUIREMENTS:

Safety Code: (G)

DATE: 11-5-93

1. Works with hazardous materials and waste. These materials may include:

> Abcolene TF Freon, Acetic Acid, Acetone, Ammonium Hydroxide, Hydrochloric Acid, Hydrofluoric Acid, Isopropyl Alcohol, Methanol, Nitric Acid, Phosphoric Acid, Potassium Hydroxide, Sulfuric Acid, Trichloroethane 1.1.1, Trichloroethylene, Decontam, Fluorinert FC-40, Photo Flow Kodak #200, Developer KTI DE-3, Chorinizor, Toulene, Ammonium Bifluoride (POWD), N-Hexane HPLC, Acetone HPLC, Photores. Shipley S1400-17, Ethyl Alcohol Gold Shield, Methylene chloride, Chrome Etch KTI #70-51, Resist Strip Emt-130, Aluminum Etch, Photoresist AZ 1350B-SF, Photoresist AZ 1350J-SF, Buffered Oxide Etch 50:1, Chorobnenzene, Photoresist AS 1370-SF, Photores Shipley S1400-27, Fluorinert FC-72, Stripper 852, Developer Dynanachem NMD3-22, TCM, Aqua Regia, Silicon Dioxide, Magnesiom Fluoride, Hafnium Oxide, Aluminum Oxide, Praseodymium Fluoride, Tin, Copper, Nickle, Aluminum, Gold, Chromium, Ultra-Therm 330 SCB, Sodium Hydroxide...

- 2. Employee will wear respiratory protection and is required to participate in the Respiratory Protection Program.
- 3. Required to be clean shaven.
- 4. Must have 24 hours Emergency Response Training which must be renewed annually.
- 5. Training is required to handle chemicals. Training includes:

Hazardous communications

6. Member of the Emergency Response Team. Must carry a beeper at all times (on and off CTI premises).

QUALIFICATIONS:

- AS degree in Electronics or equivalent
- Five to ten years experience in High Vacuum equipment maintenance or related field
- Demonstrated mechanical aptitude
- Proficient use of hand and power tools
- Must be able to work overtime as required
- Must be able to troubleshoot to the component level
- Must have the ability to communicate effectively both in writing and orally
- Must be able to make decisions on the production floor as to action to be taken using technical understanding of equipment, production needs, production schedules, and priorities, including those company wide.
- Knowledge and demonstrated aptitude of High Vacuum systems.
- Required to participate in forklift training, with updates every 2 years.
- Required to participate in Lockout/Blockout Program.

Document #:	EPW0012-01	Revision: B	Title:	ERT Training
Date Effective:	10/23/03	Approval:		Work Instruction

! PURPOSE

This document describes the training program provided to ERT members to protect life, property and the environment, and to ensure that EMS policy and procedures and regulatory and legal requirements are maintained.

II APPLICATION

ERT Members.

III DEFINITIONS

AED Automatic External Defibrillator

CTI - Crystal Technology, Inc.

DOT – Department of Transportation

ERT - Emergency Response Team

FRO - First Responder, Operations Level

HAZWOPER – Hazardous Waste Operations and Emergency Response

PPE - Personal Protective Equipment

IV ASSOCIATED MATERIALS

As indicated below.

V SAFETY

PPE as necessary. Follow all necessary CTI safety procedures.

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PROCEDURE

- 1.1 CTI ERT Members have sufficient experience to demonstrate competency in the handling of hazardous materials and ERT functions. Members initially complete, at the minimum, Cal/OSHA 8-hour HAZWOPER First Responder, Operations Level (FRO) training specified in 8 CCR 5192(q)(6)(B). In addition, they receive DOT Hazardous Waste Transportation and First Aid/CPR/AED training, as required.
- 1.2 The ERT is designed and expected to act **only** at the FRO level, which is to notify appropriate persons and/or authorities and to respond to actual or potential hazardous materials releases as part of an initial response for the purpose of protecting people, the environment or property in a defensive fashion, without actually trying to stop the release.
- 1.3 ERT members may contain the release from a safe distance, keep it from spreading and prevent exposures.
- 1.4 ERT members have:
 - An understanding of what hazardous materials are, and the risks associated with them in an incident.
 - An understanding of the potential outcomes associated with an emergency created when hazards materials are present.
 - The ability to identify hazardous materials and recognize the presence of hazardous materials in an emergency.
 - An understanding of ERT members roles in CTI's HMBP, Emergency Response/Contingency and Disaster Recovery Plans and Cal/OSHA Emergency Response/Fire Contingency Plan.
 - The ability to realize the need for additional resources and to make appropriate notifications.
 - Knowledge of basic hazard and risk assessment techniques.
 - Knowledge of how to select and use proper PPE. Needed at the FRO level.
 - · A basic understanding of hazardous materials terminology.
 - Knowledge of how to perform basic control, confinement and containment procedures.
 - Knowledge of basic rescue procedures of injured or contaminated persons within CTI FRO PPE and resources limitations.
 - Knowledge of how to implement basic equipment, victim and rescue personnel decontamination procedures.
 - An understanding of relevant operating and incident termination procedures.

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1.5 ERT members receive on a monthly basis, a cumulative total of more than 8 hours of annual refresher training as listed below:

Mont	<u>Subject</u>	Class Time
1 2 3 4 5 6 7 8 9 10	Identification of Hazardous Materials Medical Surveillance Requirements On-Site Safety Protective Clothing Selection and Use Respiratory Protection Site Assessment and Control Site Safety and Health Plan/Universal Waste Incident Command and Termination Reporting Requirements DOT Requirements Hazmat Storage Regulations (Title 22/RCRA)	55 min. 55 min.
12	Fire/Earthquake Safety	55 min.

Notes:

- 1) A description of the videos and additional training material used in each of these 12 ERT training sessions is provided in the remainder of the document.
- 2) In addition to the above described training, ERT Members receive First Aid/CPR and AED (Automatic External Defibrillator) training.

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Session 1: Identification of Hazardous Materials

Video: Injury & Illness Prevention, Long Island Productions, 16 min.

Additional Topics Covered:

- 1. Location of MSDS's, HMBP, IIPP, Contingency/Fire Plan
 - 1040 Lobby
 - EH&S Offices
 - CTI Network
- 2. How to ID HAZMAT:
 - Location: Storage Area, Warehouse, Flammable Cabinet
 - Containers
 - Markings, Colors, ID Numbers
 - NFPA Diamond
 - DOT Placard
 - HMIS Labels
 - · MSDS, Shipping Papers
 - Senses: Sight, Smell, Sound, Taste & Touch
- 3. Review Exposure Limits:
 - TLV/PEL, STEL, IDLH

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Session 2: Medical Surveillance Requirements

Video: Universal Precautions Healthcare, First Responders, Long Island Productions, 5 min.

Additional Topics Covered:

- OSHA requires all HAZMAT members who are members of an organized group that is
 expected to perform work to handle and control actual or potential leaks or spills of
 hazardous substances requiring possible close approach to the substance receive a
 baseline physical exam and participate in a medical surveillance program.
- Heat related illnesses (often associated w/ PPE). 4 types, may get progressively worse:
 - Heat rash sweating, redness, tingling or prickling sensation; shower, dry stay in cool place
 - Heat cramps profuse sweating, muscle pains, usually abdomen; move to cool environment, give 2 glasses electrolyte, not salt (nausea)
 - Heat exhaustion- pale, clammy skin, profuse sweating, headache, fatigue, dizziness, nausea, cramps: call 911, remove to cool place, sponge or mist w/ cool H₂O, fan. Maintain airway.
 - Heat stroke- red, hot, dry skin, headache, fatigue, dizziness, nausea, cramps: call 911, remove to cool place, sponge or mist w/ cool H₂O, fan. Maintain airway, observe vital signs.
- Refer to First Aid manual.
- Review AED Operation

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Session 3: On-Site Safety

Video: What's Wrong With This Picture?, Comprehensive Loss Management Institute, 21 min.

Additional Topics Covered:

• HAZCOM Review: AKA "Right-To-Know" law

The standard was created by OSHA to ensure that employees are informed about the chemicals they work with and are trained to handle them safely.

When working with chemicals, always ask yourself:

- · What chemical am I working with?
- How can it injure me?
- How can I protect myself?
- · If an accident happens, what should I do?

LABELS

- Labels-must be correct, legible and on all containers
- Review HazMat/Haz Waste label requirements

MSDS's

- 1. Chemical product and company ID.
- 2. Ingredients
- 3. Hazard ID
- 4. First Aid
- 5. Firefighting
- 6. Accidental release
- 7. Handling & storage
- 8. Exposure controls & personal protection
- 9. Physical & chemical properties
- 10. Stability & Reactivity
- 11. Toxicological info
- 12. Ecological info
- 13. Disposal
- 14. Transport
- 15. Regulatory info
- 16. Other info

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Session 4: Protective Clothing Selection and Use

Video: Personal Protective Equipment, Long Island Productions, 13 min.

Session 5: Respiratory Protection

Video: Respiratory Protection, Another World, Coastal Video Communications Corp., 19 min.

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Session 6: Site Assessment and Control

Video 1: Small Spill Containment of Hazardous Materials, Long Island Productions, 6 min., 29 sec.

<u>Video 2</u>: Handling & Storing of Compressed Gas Cylinders, Long Island Productions, 6 min., 13 sec.

Review:

"Spill Control Guidelines" (EPW0016)

Session 7: Site Safety and Health Plan/Universal Waste

Video: Site Safety Plans, Long Island Productions, 13 min., 21 sec.

Video: Quest to Recycle, EXCAL Visual Communications, 13 min.

Additional Topics Covered:

Review:

- HMBP "Emergency Response/Contingency Plan" & "Emergency Response/Fire Contingency Plan"
- City Water/Wastewater Regulations
- Hazcom & Haz Waste Labeling Requirements. All containers must include the following information, as appropriate:
- 1. Identity
- 2. Appropriate hazard warnings
- 3. Words "Hazardous Waste"
- 4. Accumulation start date
- 5. Composition & State
- 6. Generator Name & Address
- Identification of Universal Wastes
- Proper Handling of Universal Waste
- Emergency Response Procedures for Leak & Spills

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Session 8: Incident Command and Termination

Video: Incident Command and Termination, Environmental and Safety Services, 13 min., 26 sec.

Additional Topics Covered:

Review:

- Emergency Response/Fire Contingency Plan, Section 18
- HMBP Requirements
- ERT role in building evacuation procedure

Session 9: Reporting Requirements

Review:

• HMBP and Emergency Response/Fire Contingency Plan, Section 12, Reporting Requirements.

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Session 10: DOT Requirements - HM-126F HAZMAT Training

Video 1: Shipping of Hazardous Materials, Long Island Productions, 17 min., 37 sec.

Video 2: DOT HazMat/General Awareness Training, Long Island Productions, 17 min

Session 11: Hazmat Storage Regulations (Title 22/RCRA)

<u>Video 1:</u> Cradle to Grave Responsibility, Life Cycle, EXCAL Visual Communications, 9 min., 30 sec.

<u>Video 2:</u> Cradle to Grave Responsibility, Action & Reaction, EXCAL Visual Communications, 15 min., 30 sec.

Video 3: Universal Waste: Quest to Recycle, EXCAL Visual Communications, 13 min.

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Session 12: Fire/Earthquake Safety

Video 1: Fire Evacuation: In the Workplace, Long Island Productions, 17 min., 32 sec.

<u>Video 2:</u> Fire Extinguisher Training and Use, Long Island Productions, 14 min.

Video 3: Earthquake Hazards in the Workplace, California Office of Emergency Services, 10 min.

Additional Topics Covered:

Review:

Disaster Response Plan

Exercise:

 Conduct tour with ERT members to inspect main electric, gas & water shut-offs for each building

EMERGENCY RESPONSE TEAM

Date:	0 4		
Chair: Al Toy	Other:		
Agenda:		Session #:	/
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Name	<u>Signature</u>	Dept. #	
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Document #: EPP0003-01 Revision: H Title: EMS Awareness Training

EMS Awareness Training Curriculum: Chemical Handlers Page 1 of 3

Training Aids

DOT HM 126F Requirements

Video 1: Shipping of Hazardous Material, Long Island Productions, 17 min., 37 sec.

Video 2: D.O.T. HazMat/General Awareness, Long Island Productions, 17 min.

Hazmat Storage Regulations (Title 22/RCRA)

Video 1: Cradle to Grave Responsibility, Life Cycle, EXCAL Visual Communications, 19 min., 30 sec.

Video 2: Cradle to Grave Responsibility, Action & Reaction, EXCAL Visual Communications, 15 min.,

30 sec.

Video 3: Quest to Recycle, EXCAL Visual Communications, 13 min.

TYPICAL WASTES GENERATED AT CTI:

Solvents:

Acetone ethanol

IPA (propanol) methanol

Opticlear

Solvent contaminated debris

Solvent soaked Q-tips

Prosat wipes

Corrosives

HF acid

nitric acid

hydrochloric acid

Valtron SP 2500 (base)

Corrosive solids

acid contaminated glove, aprons, sleeves, etc.

Universal waste

fluorescent light tubes

Batteries

High pressure mercury lamps

Cathode Ray Tubes

flat screen displays

Any electronic devices that contain lead solder

Special Waste

Wire Saw Waste

Centrifuge sludge

Ordinary trash

Hardened epoxy

De-watered centrifuge sludge

EMS Awareness Training Curriculum: Chemical Handlers Page 2 of 3

Universal Waste

Document #:

Universal wastes are special categories of hazardous wastes that require less stringent storage and handling conditions than other hazardous wastes. The main difference between universal wastes and other hazardous wastes is that universal wastes may be stored on-site for up to one year, while other hazards wastes may be stored for only 90 days. Universal wastes generated at CTI include:

- fluorescent light tubes
- Batteries
- High pressure mercury lamps
- Cathode Ray Tubes, flat screen displays
- Any electronic devices that contain lead solder

Special Waste

Special wastes are special categories of non-hazardous wastes that may not be disposed of as regular waste due to certain constituents, such as copper, or, too much liquid content. Special wastes generated at CTI include:

- · wire saw waste
- settling tank sludge

DOT Requirements

Here at CTI, U.S. Department of Transportation (DOT) hazardous materials (including hazardous wastes) regulations generally require that wastes packaged for transportation be compatible with their containers, that the containers be DOT approved for transport, and that the containers and their contents be properly identified and labeled.

Hazmat Storage Regulations (Title 22/RCRA)

In general, Cal/EPA requires that all hazardous wastes be compatible with the container they are stored in and compatible with any contents of that container, and that the container labeled and kept closed when not in use. In addition, containers must be segregated by hazard class and kept in a secure, properly designed and identified area.

Hazardous Chemical Issue & Disposal

CTI Chemical Issue Procedures require that EP&S, Stores or ERT Members issue virgin chemicals and monitor hazardous waste collection.

Document #:	EPP0003-01	Revision:	Н	Title:	EMS Awareness Training

EMS Awareness Training Curriculum: Chemical Handlers Page 3 of 3

Spill Prevention, Chemical Transport & Spill Response

- Only trained employees designated as "Chemical Handlers" may handle bulk hazardous chemicals.
- All hazardous chemicals must be disposed of in an approved manner, and never added with non-hazardous wastes or into regular waste containers or trash bins. See your supervisor for details
- All liquid chemicals must be stored in a Palo Alto Fire Dept. approved chemical storage cabinets, or provided with secondary containment, when not in use.
- Only minimal amounts of chemicals are to be used at work stations.
- All sinks located in production areas must be provided with barriers to minimize or prevent liquid spills from escaping down the drain.
- All containers, including powders and non-hazardous chemicals, must be kept closed when not in use.
- All containers must be in good condition and compatible with the contents. Use original containers whenever feasible.
- All empty hazardous chemical containers are considered as hazardous waste, and must be decontaminated by a trained "Chemical Handler" prior to disposal.
- Virgin chemicals must be transported in their original packaging, or provided with secondary containment.
- To the greatest degree possible, chemicals must be stored in a manner to prevent contact with rain.
- In the event of a <u>large</u> (> 1 gallon) chemical spill, fire or other emergency, evacuate the area, dial 9-1-1, then notify your supervisor.
- In the event of <u>any</u> chemical spill, a spill report form must be completed by the person reporting the spill, then sent to the EP&S Department. See your supervisor to obtain the spill report form.

Cardboard Recycling

- To the greatest degree feasible, all cardboard is to be recycled.
- Recycling dumpsters are located at the rear of the 1035 and 1040 Buildings.
- All cardboard must b flattened prior to placing in the dumpster.
- Only cardboard is to go into these dumpsters. No trash or other types of wastes are allowed.



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C hemical

18644 Cox Avenue

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Saratoga, CA 95070-4108

And

(408) 374 - 9565

Safe

E nvironment

July 19, 2005

Mr. Al Toy EH&S Manager Crystal Technology, Inc. 1040 East Meadow Circle Palo Alto, CA 94303-4230

re: RCRA Waste Handler Training:

Dear Mr. Toy:

Thank you for the opportunity to present the following proposal to you on behalf of Crystal Technology, Inc.. Please consider this our preliminary estimate of costs to establish specific site Environmental and Safety Programs for your facilities located in Palo Alto. It is our understanding that the environmental and safety programs of interest may include (but is not limited to) the following:

Task 1: RCRA Waste Handler: CCR 22:

Some of the program elements will require that on-site employees be afforded training in the details of the program in order to carry out the day-to-day details. I have estimated the time required to conduct the basic program training elements. We recognize that not all of these program elements will be required to fulfill site permit requirements, or, that additional elements may be necessary to meet the specific unique needs of the customer. These costs are intended to reflect our best estimate of the cost to address typical permit conditions.

Estimated Cost:

Task 1: RCRA Waste Handler: CCR 22:

C.H.A.S.E. will prepare a site specific RCRA Waste Handler Training Program to comply with the requirements of Title 22 CCR, Section 66264.16, regarding the instructions to persons who are charged with the responsibility for making "active" hazardous waste decisions. The cost is estimated at \$400.00. Training of the waste handlers (up to 15 persons per class) is expected to require about 4 hours, for a cost of \$600.

Total Cost Task One: \$ 400.00 Training: Task One: \$ 600.00

Total This Proposal = \$1,000.00

In addition, C.H.A.S.E. is capable of providing full service environmental consulting and forensic services to industry, government and institutions of higher learning. We maintain or have access to state of the art computer facilities including computer-aided drafting/design. Our clients include Fortune 500 companies as well as a variety of smaller industry and government entities. If you require additional information, please contact us at your convenience. Normal and customary services would be billed at the rate of \$150/manhour; analytical and other outside for fee services would be billed at cost plus 15%.

We believe that C.H.A.S.E. can provide excellent service to Crystal Technology, Inc., and we are looking forward to working with you. Thank you for your consideration of C.H.A.S.E. in this matter.

Sincerely,

William L. Sanborn, R.E.A. # 02690

William L Santie

C.H.A.S.E. President

Enclosures